

REMARKS

Before this Reply, Claims 1-19 were pending in the above-referenced patent application. Through this Reply Claims 1-3, 6-14, and 16-19 have been canceled and Claims 4, 5 and 15 have been amended. As such, Claims 4, 5 and 15 are currently pending in the patent application.

In the Office Action, Claims 1, 2, 9-13 and 19 were rejected under 35 U.S.C. 102(e) as being anticipated by US 2002/0027610 to Jiang et al. ("Jiang"). Claims 3, 6, 8, 14 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Jiang. Claims 5 and 15 were deemed allowable if rewritten in independent form including limitations of base claims and all intervening claims. Applicant wishes to thank the Examiner for detailing the allowed claims.

Claims 1-4, 6-14 and 16-19 were provisionally found in conflict with claims 1-4, 7-15 and 19-22, respectively, of copending Application No. 10/001,676. Claims 1-3, 6-14, and 16-19 have been canceled from this patent application to overcome the conflict. It is respectfully submitted that Claim 4 pending herein maintains a clear line of demarcation with Claim 4 of the copending Application No. 10/001,676. Claim 4 pending herein has been amended to include limitations of the canceled base Claims 1, wherein the amended Claim 4 herein states, in relevant part:

“... wherein the step of forming the point-wise motion detection signal comprises computing

$$f_n(i, h) = T_K(d_n(i, h))$$

where f_n is the point-wise motion detection signal, i and h define a spatial location of the respective video signal value in a cartesian matrix, $T_K(\cdot)$ denotes a threshold function represented as

$$T_K(y) = \begin{cases} 1, & \text{if } y \geq K \\ 0, & \text{otherwise} \end{cases}$$

in which K is a positive constant, and $d_n(\cdot)$ is the low-pass filtered frame difference signal."

By contrast, Claim 4 of the copending Application No. 10/001,676 states, in relevant part:

"... wherein the step of forming the point-wise motion detection signal comprises computing

$$f_n(i, h) = l_K(d_n(i, h))$$

where f_n is the point-wise motion detection signal, i and h define a spatial location of the respective video signal value in a cartesian matrix, $l_K(\cdot)$ denotes a linearly scaling function represented as

$$l_K(y) = \begin{cases} 1, & \text{if } y \geq K \\ y/K, & \text{otherwise} \end{cases}$$

in which K is a positive constant value."

Clearly, at least the expression $T_K(y) = \begin{cases} 1, & \text{if } y \geq K \\ 0, & \text{otherwise} \end{cases}$ in Claim 4 pending herein

and the expression $l_K(y) = \begin{cases} 1, & \text{if } y \geq K \\ y/K, & \text{otherwise} \end{cases}$ in Claim 4 of the copending Application No.

10/001,676 are patentably distinct. As such no conflict remains between the claims of this patent application and the copending Application No. 10/001,676.

Conclusion

For these and other reasons, it is respectfully submitted that the rejection of the rejected claims should be withdrawn, and all of the claims be allowed. Accordingly, reexamination, reconsideration and allowance of all the claims are respectfully requested.

The Commissioner is hereby authorized to charge any payment, or credit any overpayment, to Deposit Account No. 01-1960, in connection with this reply.

Respectfully submitted,

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